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January 3, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Eric N. Vitaliano, U.S.D.J.
225 Cadman Plaza East
Courtroom 4C South
Brooklyn, NY 11201-1804

Re: Fidan, et ano. v. Istanbul Rego Park Inc., et al.

Case No.: 1:22-cv-2252 (ENV) (SJB)

MLLG File No.: 101-2022

Dear Judge Vitaliano:

Happy new year! This office represents the Defendants in the above-referenced case. Defendants write, with Plaintiff's consent, to respectfully request a one (1) week extension of time – until Tuesday, January 10, 2023 – to submit Defendants' reply memorandum of law in further support of their motion to dismiss for failure to state a claim upon which relief can be granted.

Pursuant to ¶ I(H) of this Court's Individual Motion Practice and Rules, Defendants respectfully submit that: (i) the original date to submit a reply memorandum of law is today, January 3, 2023; (ii-iii) there have been no previous requests for an extension of time of this deadline; (iv) the reason for the requested extension is because your undersigned was regrettably confined to bed rest with a severe flu from Friday, December 30, 2022 until yesterday and was unable to complete the reply papers; and (v) the Plaintiffs consent to this request.

Accordingly, Defendants respectfully submit that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this Court for its time, attention, and continued courtesies in this case.

Dated: Lake Success, New York January 3, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

_/s/ Emanuel Kataev, Esq.

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